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Attorney's for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 98-0552ACK-02
)	
Plaintiff,)	MOTION FOR DOWNWARD DEPARTURE
)	IN SENTENCING DEFENDANT KRAAN
VS.)	
)	
JORGE LUIS GONZALEZ, also)	
known as "Victor Delgado",)	Sentencing Date: 2/26/07 at
"Victor Simental", "George",)	1:30 p.m., before the Hon.
and "G", (01))	Alan C. Kay, Senior U.S.
REINIER L.A. KRAAN, II,)	District Judge
also known as "Ray", (02))	
AJMAL J. SULAIMANKHIL, also)	
known as "Johnny", (03))	
JAMES ORAL SHELDON, III, (04))	
CORNELIO D. BUMANGLAG,)	
JUNIOR, (05))	
JANEL SALVADOR RAMOS, (06))	
SHAWN CURTIS SANCHEZ, also)	
known as "Momo", (07))	
EARLY R. VINSON, JUNIOR, (08))	
)	
Defendants.)	
)	
)	

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 03-0366SOM
)	
Plaintiff,)	
)	
vs.)	
)	
REINIER L.A. KRAAN, II,)	
)	
Defendant.)	
_____)	
)	
UNITED STATES OF AMERICA,)	CR. NO. 04-0210DAE
)	[F.R.Cr.P. 20 case transferred
Plaintiff,)	from the District of Nevada]
)	
vs.)	
)	
REINIER L.A. KRAAN, II,)	
)	
Defendant.)	
_____)	

MOTION FOR DEPARTURE DOWNWARD
IN SENTENCING DEFENDANT KRAAN

The United States of America, by and through its undersigned counsel, hereby moves this Honorable Court to depart downwards in imposing sentence upon defendant Reinier L.A. Kraan, II, due to his substantial assistance to and cooperation with law enforcement authorities in the investigation or prosecution of other persons who have committed an offense.

This motion is made pursuant to U.S. Sentencing Commission Guideline 5K1.1, and is based upon the information contained in

the sealed "Factual Basis for Motion for Departure Downward in Sentencing Defendant Kraan", filed concurrently herewith.

DATED: Honolulu, Hawaii, February 23, 2007.

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii

By /s/ Michael K. Kawahara
MICHAEL K. KAWAHARA
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that, on the dates and by the methods of service noted below, a true and correct copy of the foregoing was served on the following at their last known addresses:

Served Electronically through CM/ECF:

Mr. Richard Gronna rgronna@hawaii.rr.com February 23, 2007

Attorney for Defendant
Reinier L.A. Kraan

Served by hand-delivery:

Probation Officer February 23, 2007
300 Ala Moana Blvd.,
Box 50111, Rm. C-126
Honolulu, HI 96850

/s/ Rowena N. Kang